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FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	
Forward-Looking Mechanism for	)	CC Docket No. 97-160
High Support for Non-Rural LECs	)	
	)	

**FURTHER COMMENTS OF AMERITECH**

Pursuant to the Common Carrier Bureau's Public Notice in the above-captioned matter,<sup>1</sup> Ameritech<sup>2</sup> submits these further comments on various proposals for high cost universal service support.

**I. DEFINING "HOUSEHOLDS"**

The Commission established in its Universal Service Order that a cost model or study must estimate the cost of providing service for all business and households within a wire center, or, if feasible, smaller areas. The Bureau has indicated that different parties have advocated different interpretations of "households" as used in its sixth criterion; and it encourages parties to submit additional comments on the appropriate universe of "households" that should be used in

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<sup>1</sup> Public Notice, DA 98-848 (released April 15, 1998).

<sup>2</sup> Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

calculating the cost of supported services.<sup>3</sup> In addition, the Bureau seeks comment on whether the Commission should require incumbent LECs to provide the universal service administrator with wire center boundary data and the number of residential and multi-line and single-line business lines serviced in each wire center.

The appropriate universe of "households" to include in calculating the cost of supported services is households with telephones. To develop costs for supported services using this universe will permit an adequate recognition of any economies of scale and scope to provide service to existing customers. Consequently, this universe of "households" satisfies the requirements of the Commission's sixth cost study criterion.<sup>4</sup> However, any extension of that universe beyond households with telephones would be inconsistent with the requirement of the Commission's first cost study criterion that wire center line counts and average loop length equal actual data.<sup>5</sup> Therefore, to expand the universe beyond households with telephones would unnecessarily clutter the calculation of the cost of supported services.

In addition, Ameritech does not object at this time to providing to the universal service administrator the number of residential, multi-line, and single-line business lines in service in each wire center. However, wire center boundary data for Ameritech that would permit automatic mapping into the existing proxy model's geographic areas is not available.

## **II. DEPRECIATION**

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<sup>3</sup> Notice at 4-6.

<sup>4</sup> May 8, 1997, Universal Service Order at 250.

<sup>5</sup> *Id.*

The Commission established in its Universal Service Order a set of criteria that a cost study or model must meet for determining the cost of supported services.<sup>6</sup> In particular, economic lives and net salvage percentages used in such studies must fall within the existing Commission-authorized ranges. The Bureau now requests further comments on the particular values of depreciation lives and future net salvage percentages that should be used in determining the cost of supported services. In addition, the Bureau solicits any discussion or information, including full explanation of any data that falls outside of Commission ranges, that would enable the Commission to determine appropriate depreciation expenses for supported services.<sup>7</sup>

The Commission has traditionally prescribed long depreciation lives for assets used by local telephone companies. Implicit in this past arrangement was the understanding that telephone companies would be able to complete the recovery of the cost of their assets in future rates for regulated service, even after the physical assets no longer have economic value. This implicit subsidy arrangement (whereby current ratepayers subsidize past ratepayers) is no longer appropriate or sustainable in a competitive market. In fact, stranded plant is a legitimate concern for incumbent local exchange carriers in the current operating environment. Certainly, a new entrant will be bound only by its expectations of the marketplace. Therefore, the market must be the primary guide for determining economic lives and net salvage percentages.

In the current rapidly changing economic environment, the use of forward-looking economic lives is more appropriate than the historical based approach used by the Commission. Forward-looking lives should be used because of technological changes, customer demands for

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<sup>6</sup> *Id.*

<sup>7</sup> Notice at 6-7.

new services, and increased competition. Technology changes are occurring so rapidly that equipment placed today will be obsolete well before the plant physically deteriorates. Due to this rapid changing technology, it is economically unreasonable to assume that equipment placed today will or should remain in service as long as the equipment it replaced. Moreover, customer demands drive the placement of new platforms having new capabilities for both incumbent LECs and new entrants. Finally, increased competition also means that a LEC must respond more quickly to the marketplace, requiring that a LEC's network have the latest technologies to adjust effectively to competitive offerings.

The use of asset lives and net salvage percentages within Commission-prescribed ranges are not necessarily appropriate because they are based on a historical mortality analysis rather than a forward-looking analysis. In the past, the Commission regulated depreciation lives and net salvage percentages as a part of the rate base rate-of-return process for setting rates for services. In this prior environment, the assets were retired when they were physically worn out, with the primary cause for the decline in asset value being physical wear-and-tear. Thus, the retirements of the assets formed a reasonable basis for estimating the life expectancy of these assets. However, as wear-and-tear has given way to technological and economic obsolescence, historical retirements are no longer a valid indicator of the economic lives of assets. Even though physical factors were the most readily apparent causes of retirements in the past, other factors such as technological changes are becoming the more frequent causes. Current technological advances have increased the frequency with which obsolescence causes "premature" retirement of existing plant.

The Michigan Public Service Commission ("MPSC"), in Ameritech's TELRIC case, echoes this same premise of premature retirement caused by technological change. The MPSC

stated in its rehearing order:

... the Commission is persuaded that the asset lives proposed by Ameritech Michigan are more forward-looking than those that the Commission initially adopted in the July 14, 1997 order. As such, the Commission concludes that they are more reasonable than the FCC prescription lives, which more closely resemble cost-based regulation than TSLRIC principles. The Commission agrees with Ameritech Michigan and the Staff that, in a more competitive environment, the development of new technologies and a greater sensitivity to customers' needs can be expected to stimulate new investment and hasten the obsolescence of existing equipment.<sup>8</sup>

While several of the economic lives approved by the MPSC fall outside the Commission-authorized ranges, their use in developing the cost of supported services is consistent with the Commission's encouragement to states to rely on their proceedings which establish permanent unbundled network element rates.<sup>9</sup> Within this context, the lives or net salvage percentages that are consistent with forward-looking unbundled network element pricing should be permitted.

### **III. REVENUES TO BE INCLUDED AND LEVEL OF THE BENCHMARK**

The Commission determined in its Universal Service Order that the federal high cost support mechanism would fund 25% of the difference between the estimated forward-looking economic cost of providing the supported services and a revenue-based benchmark. In addition, the Commission found that the calculation of any benchmark must be consistent with the method of calculating the forward-looking cost of constructing and operating the network.<sup>10</sup> In particular, the Commission included access and intraLATA toll revenues, but indicated that it would clarify the appropriate amounts to be included in the benchmark. Ultimately, using 1994

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<sup>8</sup> In the Matter of the Commission's own Motion, to Consider the Total Service Long Run Incremental Cost and to Determine the Prices of Unbundled Network Elements, Interconnection Services, Resold Services, and Basic Local Exchange Services for Ameritech Michigan, Case No. U-11280, January 28, 1998, p. 7.

<sup>9</sup> May 8, 1997, Universal Service Order, ¶251.

<sup>10</sup> *Id.* at ¶267.

data, the Commission suggested that benchmarks might be set at approximately \$31 for residential service and \$51 for business service. The Bureau now seeks comment on the calculation and level of the revenue-based benchmark as well as any cost adjustments that may be needed to maintain consistency between the benchmark and forward-looking cost of the supported services.<sup>11</sup>

The determination of the benchmark and the appropriate economic cost for the high cost fund should be evaluated against Chairman Kennard's "8 Principles" for universal service.<sup>12</sup> These principles provide a solid framework for evaluating alternative proposals for high cost support as well as modifications for the existing federal support mechanism. Ameritech submitted comments on the Common Carrier Bureau's Public Notice on high cost proposals on May 15, 1998.<sup>13</sup> It concluded that the Commission's current plan with a slight modification for rural carriers will size the high cost fund appropriately. Consequently, while the Commission may wish to update the benchmarks using more recent data, no changes should be made in the method of determining the revenue-based benchmarks and the services included in the cost

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<sup>11</sup> Notice at 8-9.

<sup>12</sup> Address to the National Association of State Utility Consumer Advocates, February 9, 1998.

<sup>13</sup> Public Notice, DA 98-715 (release April 15, 1998).

development. Moreover, developing, reviewing and commenting on the inclusion of additional costs associated with services included in the benchmark, but not captured in the proxy cost models, would only introduce additional delay in the process that could seriously jeopardize timely implementation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael S. Pabian", written over a horizontal line.


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[MSP0135.doc]

CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of the foregoing Further Comments of Ameritech has been served on the parties listed on the attached service list, via first class mail, postage prepaid, on this 1<sup>st</sup> day of June, 1998.

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